

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JAMES GINZKEY, RICHARD  
FITZGERALD, CHARLES CERF, BARRY  
DONNER, and on behalf of the class members  
described below,

Plaintiffs,

v.

NATIONAL SECURITIES CORPORATION,  
a Washington Corporation,

Defendant.

Case No.: 2:18-cv-01773-RSM

**DECLARATION OF JAMES R.  
MORRISON IN SUPPORT OF  
DEFENDANT NATIONAL  
SECURITIES CORPORATION'S  
MOTION TO EXCLUDE MASON  
ALAN DINEHART III'S PROPOSED  
EXPERT OPINIONS**

ORAL ARGUMENT REQUESTED

I, James R. Morrison, am older than 21 years of age, have personal knowledge of the facts,  
and am competent to testify thereto.

1. I am an attorney representing defendant National Securities Corporation ("NSC")  
in this matter.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from the publicly  
available website <https://www.imdb.com/title/tt0076983/>.

3. Attached as Exhibit 2 is a true and correct copy of excerpts from 2/4/2004 -  
Academic Certificate for Mason Dinehart.

4. Attached as Exhibit 3 is a true and correct copy of excerpts from the Broker Check report for Silber Bennett Financial Inc., CRD# 156435.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the Broker Check report for Boardwalk Capital Corp., CRD# 10279 dated 6/26/2007.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the Broker Check Report of Mason Alan Dinehart III, CRD # 68314.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from the Expert Report of Mason Alan Dinehart III, dated 11/10/2021.

8. Attached as Exhibit 7 is a true and correct copy of excerpts from the Rebuttal Expert Report of Mason Alan Dinehart III, dated 12/15/2021.

9. Attached as Exhibit 8 is a true and correct copy of excerpts from the January 5, 2022 deposition transcript of Plaintiffs' designated expert Mason Alan Dinehart III.

10. Attached as Exhibit 9 is a true and correct copy of excerpts from the Rebuttal Expert Report of William Purcell dated 12/15/2021.

11. Attached as Exhibit 10 is a true and correct copy of excerpts from the Rebuttal Expert Report of Kamran Fotouhi dated 12/15/2021.

12. Attached as Exhibit 11 is a true and correct copy of documents produced by Mason Alan Dinehart III bates numbered Dinehart Subpoena Response 000328-343, 380.

13. Attached as Exhibit 12 is a true and correct copy of excerpts from an article titled "A. Checklist for "Reasonable" Due Diligence 'The Scorecard'" by Mason Alan Dinehart III.

14. Attached as Exhibit 13 is a true and correct copy of excerpts from the Expert Report Of Mason Alan Dinehart III, dated 11/10/2021.

15. Attached as Exhibit 14 is a true and correct copy of excerpts from the Expert Report Of Mason Alan Dinehart III, dated 11/10/2021 and Rebuttal Expert Report of Mason Alan Dinehart III, dated 12/15/2021.



**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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***Attorneys for Plaintiffs***

s/ Laetitia Knox  
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Legal Assistant